

EXHIBIT H



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FOUNDED 1866

April 9, 2007

By Email

Loren Kieve
Quinn Emanuel Urquhart Oliver & Hedges
50 California Street, 22nd Floor
San Francisco, CA 94111

Re: Bondi v. Bank of America, 04 MD 1653 (LAK) (S.D.N.Y.)

Dear Loren:

As a follow up to my letter dated April 6, 2007, and in response to your email of the same date, I write to inform you that Bank of America is continuing to pursue the following depositions:

- Parmalat Venezuela employees Giovanni Ghiradelli and Carlo Siguin, whom your firm has already agreed to make available April 18-20 in New York;
- Alleged "innocent insiders" Alberto Grignaffini and Manfredi Ciaburri, whose depositions were approved by Judge Kaplan on Jan. 30 and by the Italian Court of Appeals on March 6. We have been working diligently to reach these individuals and schedule their depositions, an effort made more difficult by your firm's refusal to provide us with their phone numbers;
- Alberto Nagel, whose deposition has been set, after a hearing in front of Judge Kluzer on March 30, for May 3 in Milan; and
- Andrea Petrucci, a former Parmalat insider and PCFL Board Member who was initially contacted months ago, but was not available for a deposition until after March 5. Additionally, our need to depose Mr. Petrucci only became clear after the Rule 30(b)(6) deposition of PCFL on March 2.

In addition, we share the interest of other parties in taking part in the depositions of Roberto Robotti, Marilena Cederna and Roberto Pirola. These depositions are scheduled to take place in accordance with the order of Judge Kluzer.



Loren Kieve
April 9, 2007
Page 2

We thus object to you taking any action to vacate the presently scheduled depositions or to frustrate the Bank's efforts to schedule the depositions listed above.

Sincerely,

A handwritten signature in cursive script that reads "Mark Guerrero" followed by a slanted line and the initials "BV".

Mark P. Guerrero

Vann, Brian D.

From: Vann, Brian D.
Sent: Monday, April 09, 2007 5:51 PM
To: 'Loren Kieve'; 'Dell, Michael J.'
Cc: 'Quinn Emanuel Parmalat Counsel'; 'aabramowitz@srk-law.com'; 'aglenn@kasowitz.com'; 'CMHTParmalat@cmht.com'; 'DiamondParmalatCounsel@diamondmccarthy.com'; 'dzilka@gelaw.com'; 'HBDParmalatCounsel@hbdlawyers.com'; 'hminkel@nyc.rr.com'; 'jbauchner@kasowitz.com'; 'jkairis@gelaw.com'; 'jsabella@gelaw.com'; 'lbeus@beusgilbert.com'; 'mbowen@kasowitz.com'; 'mfay@kasowitz.com'; 'rjanvey@janveygordon.com'; 'rkopp@srk-law.com'; 'RKraemer@srk-law.com'; 'rmills@beusgilbert.com'; 'rroseman@srk-law.com'; 'rwilliams@beusgilbert.com'; 'sgrant@gelaw.com'; 'sstirling@beusgilbert.com'; 'tparis@beusgilbert.com'; '#NYCCliffordChanceParmalatCounsel@CliffordChance.com'; 'scraig@beusgilbert.com'; 'adevooght@winston.com'; 'asalpeter@mayerbrown.com'; 'bbraun@winston.com'; 'bhudak@mayerbrownrowe.com'; 'bnl.attorneys@dpw.com'; 'cbrubaker@kdefe.com'; 'Siegel, Craig'; 'cweller@winston.com'; 'deloitte.us.parmalat.counsel@dpw.com'; 'dring@mayerbrownrowe.com'; 'hamza@hugheshubbard.com'; 'HellerParmalatCounsel@hellerehrman.com'; 'HMWParmalatCounsel@hmw.com'; 'JANET.LINK@lw.com'; 'jbaughman@paulweiss.com'; 'jbove@mintz.com'; 'Davis, Jeffrey W.'; 'jdonley@kdefe.com'; 'jkinney@ffspc.com'; 'John.Casey@lw.com'; 'Popolow, Jonathan'; 'kbasabe@mintz.com'; 'kdejong@winston.com'; 'Khemani@hugheshubbard.com'; 'Lanier.saperstein@newyork.allenoverly.com'; 'laura.martin@allenoverly.com'; 'lcoberly@winston.com'; 'mclambert@lawpost-nyc.com'; 'meweinhart@belinlaw.com'; 'Michael.feldberg@newyork.allenoverly.com'; 'miles.ruthberg@lw.com'; 'mmace@winston.com'; 'Oberman, Michael S.'; 'modorizzi@mayerbrown.com'; 'Pakrashi, Neil'; 'peter.devereaux@lw.com'; 'Rbodian@mintz.com'; 'rwlozier@belinlaw.com'; 'Sidley Parmalat Counsel'; 'Ruskay-Kidd, Scott'; 'Stroock Parmalat Counsel'; 'Harkness, Timothy P.'; 'thuynh@kdefe.com'; 'Todd.fishman@newyork.allenoverly.com'; 'Flagg, Ronald S.'; 'Griffin, Sean C.'
Subject: RE: Parmalat - Termination of Fact Discovery
Attachments: Untitled.pdf

Please see attached.

Regards,
Brian

From: Loren Kieve [mailto:lorenkieve@quinnemanuel.com]
Sent: Friday, April 06, 2007 6:43 PM
To: Vann, Brian D.; Dell, Michael J.
Cc: Quinn Emanuel Parmalat Counsel; aabramowitz@srk-law.com; aglenn@kasowitz.com; CMHTParmalat@cmht.com; DiamondParmalatCounsel@diamondmccarthy.com; dzilka@gelaw.com; HBDParmalatCounsel@hbdlawyers.com; hminkel@nyc.rr.com; jbauchner@kasowitz.com; jkairis@gelaw.com; jsabella@gelaw.com; lbeus@beusgilbert.com; mbowen@kasowitz.com; mfay@kasowitz.com; rjanvey@janveygordon.com; rkopp@srk-law.com; RKraemer@srk-law.com; rmills@beusgilbert.com; rroseman@srk-law.com; rwilliams@beusgilbert.com; sgrant@gelaw.com; sstirling@beusgilbert.com; tparis@beusgilbert.com; #NYCCliffordChanceParmalatCounsel@CliffordChance.com; scraig@beusgilbert.com; adevooght@winston.com; asalpeter@mayerbrown.com; bbraun@winston.com; bhudak@mayerbrownrowe.com; bnl.attorneys@dpw.com; cbrubaker@kdefe.com; Siegel, Craig;

6/4/2007

cweller@winston.com; deloitte.us.parmalat.counsel@dpw.com; dring@mayerbrownrowe.com; hamza@hugheshubbard.com; HellerParmalatCounsel@hellerehrman.com; HMWParmalatCounsel@hmw.com; JANET.LINK@lw.com; jbaughman@paulweiss.com; jbove@mintz.com; Davis, Jeffrey W.; jdonley@kdefe.com; jkinney@ffspc.com; John.Casey@lw.com; Popolow, Jonathan; kbasabe@mintz.com; kdejong@winston.com; Khemani@hugheshubbard.com; Lanier.saperstein@newyork.allenoverly.com; laura.martin@allenoverly.com; lcoberly@winston.com; mclambert@lawpost-nyc.com; meweinhart@belinlaw.com; Michael.feldberg@newyork.allenoverly.com; miles.ruthberg@lw.com; mmace@winston.com; Oberman, Michael S.; modorizzi@mayerbrown.com; Pakrashi, Neil; peter.devereaux@lw.com; Rbodian@mintz.com; rwlozier@belinlaw.com; Sidley Parmalat Counsel; Ruskay-Kidd, Scott; Stroock Parmalat Counsel; Harkness, Timothy P.; thuyinh@kdefe.com; Todd.fishman@newyork.allenoverly.com; Flagg, Ronald S.; Griffin, Sean C.
Subject: RE: Parmalat - Termination of Fact Discovery

Dear Mark:

For the sake of good order and clarity, could you please let us know which "certain depositions" you have in mind?

Regards,
Loren Kieve

From: Vann, Brian D. [mailto:BVann@Sidley.com]
Sent: Friday, April 06, 2007 2:09 PM
To: Loren Kieve; Dell, Michael J.
Cc: Quinn Emanuel Parmalat Counsel; aabramowitz@srk-law.com; aglenn@kasowitz.com; CMHTParmalat@cmht.com; DiamondParmalatCounsel@diamondmccarthy.com; dzilka@gelaw.com; HBDParmalatCounsel@hbdlawyers.com; hminkel@nyc.rr.com; jbauchner@kasowitz.com; jkairis@gelaw.com; jsabella@gelaw.com; lbeus@beusgilbert.com; mbowen@kasowitz.com; mfay@kasowitz.com; rjanvey@janveygordon.com; rkopp@srk-law.com; RKraemer@srk-law.com; rmills@beusgilbert.com; rroseman@srk-law.com; rwilliams@beusgilbert.com; sgrant@gelaw.com; sstirling@beusgilbert.com; tparis@beusgilbert.com; #NYCCliffordChanceParmalatCounsel@CliffordChance.com; scraig@beusgilbert.com; adevooght@winston.com; asalpeter@mayerbrown.com; bbrown@winston.com; bhudak@mayerbrownrowe.com; bnl.attorneys@dpw.com; cbrubaker@kdefe.com; Siegel, Craig; cweller@winston.com; deloitte.us.parmalat.counsel@dpw.com; dring@mayerbrownrowe.com; hamza@hugheshubbard.com; HellerParmalatCounsel@hellerehrman.com; HMWParmalatCounsel@hmw.com; JANET.LINK@lw.com; jbaughman@paulweiss.com; jbove@mintz.com; Davis, Jeffrey W.; jdonley@kdefe.com; jkinney@ffspc.com; John.Casey@lw.com; Popolow, Jonathan; kbasabe@mintz.com; kdejong@winston.com; Khemani@hugheshubbard.com; Lanier.saperstein@newyork.allenoverly.com; laura.martin@allenoverly.com; lcoberly@winston.com; mclambert@lawpost-nyc.com; meweinhart@belinlaw.com; Michael.feldberg@newyork.allenoverly.com; miles.ruthberg@lw.com; mmace@winston.com; Oberman, Michael S.; modorizzi@mayerbrown.com; Pakrashi, Neil; peter.devereaux@lw.com; Rbodian@mintz.com; rwlozier@belinlaw.com; Sidley Parmalat Counsel; Ruskay-Kidd, Scott; Stroock Parmalat Counsel; Harkness, Timothy P.; thuyinh@kdefe.com; Todd.fishman@newyork.allenoverly.com; Flagg, Ronald S.; Griffin, Sean C.
Subject: RE: Parmalat - Termination of Fact Discovery

Counsel -

Please see attached.

Regards,
Brian

6/4/2007

From: Carino, Michele S. [mailto:mcarino@stroock.com]
Sent: Friday, April 06, 2007 3:30 PM
To: Loren Kieve; Dell, Michael J.
Cc: Quinn Emanuel Parmalat Counsel; aabramowitz@srk-law.com; aglenn@kasowitz.com; CMHTParmalat@cmht.com; DiamondParmalatCounsel@diamondmccarthy.com; dzilka@gelaw.com; HBDParmalatCounsel@hbdlawyers.com; hminkel@nyc.rr.com; jbauchner@kasowitz.com; jkairis@gelaw.com; jsabella@gelaw.com; lbeus@beusgilbert.com; mbowen@kasowitz.com; mfay@kasowitz.com; rjanvey@janveygordon.com; rkopp@srk-law.com; RKraemer@srk-law.com; rmills@beusgilbert.com; roseman@srk-law.com; rwilliams@beusgilbert.com; sgrant@gelaw.com;sstirling@beusgilbert.com; tparis@beusgilbert.com; #NYCCliffordChanceParmalatCounsel@CliffordChance.com; scraig@beusgilbert.com; adevooght@winston.com; asalpeter@mayerbrown.com; bbrown@winston.com; bhudak@mayerbrownrowe.com; bnl.attorneys@dpw.com; cbrubaker@kdefe.com; Siegel, Craig; cweller@winston.com; deloitte.us.parmalat.counsel@dpw.com; dring@mayerbrownrowe.com; hamza@hugheshubbard.com; HellerParmalatCounsel@hellerehrman.com; HMWParmalatCounsel@hmw.com; JANET.LINK@lw.com; jbaughman@paulweiss.com; jbove@mintz.com; Davis, Jeffrey W.; jdonley@kdefe.com; jkinney@ffspsc.com; John.Casey@lw.com; Popolow, Jonathan; kbasabe@mintz.com; kdejong@winston.com; Khemani@hugheshubbard.com; Lanier.saperstein@newyork.allenover.com; laura.martin@allenover.com; lcoberly@winston.com; mclambert@lawpost-nyc.com; meweinhart@belinlaw.com; Michael.feldberg@newyork.allenover.com; miles.ruthberg@lw.com; mmace@winston.com; Oberman, Michael S.; modorizzi@mayerbrown.com; Pakrashi, Neil; peter.devereaux@lw.com; Rbodian@mintz.com; rwlozier@belinlaw.com; Sidley Parmalat Counsel; Ruskay-Kidd, Scott; Stroock Parmalat Counsel; Harkness, Timothy P.; thuynh@kdefe.com; Todd.fishman@newyork.allenover.com; Flagg, Ronald S.; Griffin, Sean C.
Subject: RE: Parmalat - Termination of Fact Discovery

Please see the attached.

Michele S. Carino
Stroock & Stroock & Lavan
(212) 806-5949

From: Loren Kieve [mailto:lorkieve@quinnemanuel.com]
Sent: Thursday, April 05, 2007 5:44 PM
To: Dell, Michael J.
Cc: Quinn Emanuel Parmalat Counsel; aabramowitz@srk-law.com; aglenn@kasowitz.com; CMHTParmalat@cmht.com; DiamondParmalatCounsel@diamondmccarthy.com; dzilka@gelaw.com; HBDParmalatCounsel@hbdlawyers.com; hminkel@nyc.rr.com; jbauchner@kasowitz.com; jkairis@gelaw.com; jsabella@gelaw.com; lbeus@beusgilbert.com; mbowen@kasowitz.com; mfay@kasowitz.com; rjanvey@janveygordon.com; rkopp@srk-law.com; RKraemer@srk-law.com; rmills@beusgilbert.com; roseman@srk-law.com; rwilliams@beusgilbert.com; sgrant@gelaw.com;sstirling@beusgilbert.com; tparis@beusgilbert.com; #NYCCliffordChanceParmalatCounsel@CliffordChance.com; scraig@beusgilbert.com; adevooght@winston.com; asalpeter@mayerbrown.com; bbrown@winston.com; bhudak@mayerbrownrowe.com; bnl.attorneys@dpw.com; cbrubaker@kdefe.com; Siegel, Craig; cweller@winston.com; deloitte.us.parmalat.counsel@dpw.com; dring@mayerbrownrowe.com; hamza@hugheshubbard.com; HellerParmalatCounsel@hellerehrman.com; HMWParmalatCounsel@hmw.com; JANET.LINK@lw.com; jbaughman@paulweiss.com; jbove@mintz.com; Davis, Jeffrey W.; jdonley@kdefe.com; jkinney@ffspsc.com; John.Casey@lw.com; Popolow, Jonathan; kbasabe@mintz.com; kdejong@winston.com; Khemani@hugheshubbard.com;

6/4/2007

Lanier.saperstein@newyork.allenoverly.com; laura.martin@allenoverly.com; lcoberly@winston.com; mclambert@lawpost-nyc.com; meweinhart@belinlaw.com; Michael.feldberg@newyork.allenoverly.com; miles.ruthberg@lw.com; mmace@winston.com; Oberman, Michael S.; modorizzi@mayerbrown.com; Pakrashi, Neil; peter.devereaux@lw.com; Rbodian@mintz.com; rwlozier@belinlaw.com; SidleyParmalatCounsel@sidley.com; Ruskay-Kidd, Scott; Stroock Parmalat Counsel; Harkness, Timothy P.; thuyinh@kdefe.com; Todd.fishman@newyork.allenoverly.com

Subject: RE: Parmalat - Termination of Fact Discovery

Dear Michael:

We do not see that there is anything to consider. You have repeatedly taken the position that, apart from pending disputes and agreed depositions, depositions are over. We are agreeing with you.

As you probably know, the week of April 16 is smack in the middle of the Milan furniture fair and it is very difficult to arrange transportation, etc.

We look forward to your prompt response to our letter. Your assumption is correct that we will not send anything to Judge Kluzer (or anyone else) until we have your confirmation of your position that these depositions should be cancelled.

Regards,

Loren Kieve

From: Dell, Michael J. [mailto:mdell@KRAMERLEVIN.com]

Sent: Thursday, April 05, 2007 2:39 PM

To: Loren Kieve

Cc: Quinn Emanuel Parmalat Counsel; aabramowitz@srk-law.com; aglenn@kasowitz.com; CMHTParmalat@cmht.com; DiamondParmalatCounsel@diamondmccarthy.com; dzilka@gelaw.com; HBDParmalatCounsel@hbdlawyers.com; hminkel@nyc.rr.com; jbauchner@kasowitz.com; jkairis@gelaw.com; jsabella@gelaw.com; lbeus@beusgilbert.com; mbowen@kasowitz.com; mfay@kasowitz.com; rjanvey@janveygordon.com; rkopp@srk-law.com; RKraemer@srk-law.com; rmills@beusgilbert.com; rroseman@srk-law.com; rwilliams@beusgilbert.com; sgrant@gelaw.com; sstirling@beusgilbert.com; tparis@beusgilbert.com; #NYCCliffordChanceParmalatCounsel@CliffordChance.com; scraig@beusgilbert.com; adevooght@winston.com; asalpeter@mayerbrown.com; bbrown@winston.com; bhudak@mayerbrownrowe.com; bni.attorneys@dpw.com; cbrubaker@kdefe.com; Siegel, Craig; cweller@winston.com; deloitte.us.parmalat.counsel@dpw.com; dring@mayerbrownrowe.com; hamza@hugheshubbard.com; HellerParmalatCounsel@hellerehrman.com; HMWParmalatCounsel@hmw.com; JANET.LINK@lw.com; jbaughman@paulweiss.com; jbove@mintz.com; Davis, Jeffrey W.; jdonley@kdefe.com; jkinney@ffspc.com; John.Casey@lw.com; Popolow, Jonathan; kbasabe@mintz.com; kdejong@winston.com; Khemani@hugheshubbard.com; Lanier.saperstein@newyork.allenoverly.com; laura.martin@allenoverly.com; lcoberly@winston.com; mclambert@lawpost-nyc.com; meweinhart@belinlaw.com; Michael.feldberg@newyork.allenoverly.com; miles.ruthberg@lw.com; mmace@winston.com; Oberman, Michael S.; modorizzi@mayerbrown.com; Pakrashi, Neil; peter.devereaux@lw.com; Rbodian@mintz.com; rwlozier@belinlaw.com; SidleyParmalatCounsel@sidley.com; Ruskay-Kidd, Scott; stroockparmalatcounsel@stroock.com; Harkness, Timothy P.; thuyinh@kdefe.com; Todd.fishman@newyork.allenoverly.com

Subject: RE: Parmalat - Termination of Fact Discovery

Dear Loren:

Thank you for your email. We are considering it, have scheduled a call with counsel for other

defendants tomorrow to discuss it, and will get back to you about it. In the meantime, we assume that you will not send your proposed letter to Judge Kluzer.

Sincerely,

Michael Dell

-----Original Message-----

From: lorenkieve@quinnemanuel.com

Sent: Wednesday, April 04, 2007 7:22 PM

To: Dell, Michael J.

Cc: quinnemanuelparmalatcounsel@quinnemanuel.com; aabramowitz@srk-law.com; aglenn@kasowitz.com; CMHTParmalat@cmht.com; DiamondParmalatCounsel@diamondmccarthy.com; dzilka@gelaw.com; HBDParmalatCounsel@hbdlawyers.com; hminkel@nyc.rr.com; jbauchner@kasowitz.com; jkairis@gelaw.com; jsabella@gelaw.com; lbeus@beusgilbert.com; mbowen@kasowitz.com; mfay@kasowitz.com; rjanvey@janveygordon.com; rkopp@srk-law.com; RKraemer@srk-law.com; rmills@beusgilbert.com; rroseman@srk-law.com; rwilliams@beusgilbert.com; sgrant@gelaw.com; sstirling@beusgilbert.com; tparis@beusgilbert.com; #NYCCliffordChanceParmalatCounsel@CliffordChance.com; scraig@beusgilbert.com; adevooght@winston.com; asalpeter@mayerbrown.com; bbrown@winston.com; bhudak@mayerbrownrowe.com; bnl.attorneys@dpw.com; cbrubaker@kdefe.com; Siegel, Craig; cweller@winston.com; deloitte.us.parmalat.counsel@dpw.com; dring@mayerbrownrowe.com; hamza@hugheshubbard.com; HellerParmalatCounsel@hellerehrman.com; HMWParmalatCounsel@hmw.com; JANET.LINK@lw.com; jbaughman@paulweiss.com; jbove@mintz.com; Davis, Jeffrey W.; jdonley@kdefe.com; jkinney@ffspc.com; John.Casey@lw.com; Popolow, Jonathan; kbasabe@mintz.com; kdejong@winston.com; Khemani@hugheshubbard.com; Lanier.saperstein@newyork.allenoverly.com; laura.martin@allenoverly.com; lcoberly@winston.com; mclambert@lawpost-nyc.com; meweinhart@belinlaw.com; Michael.feldberg@newyork.allenoverly.com; miles.ruthberg@lw.com; mmace@winston.com; Oberman, Michael S.; modorizzi@mayerbrown.com; Pakrashi, Neil; peter.devereaux@lw.com; Rbodian@mintz.com; rwlozier@belinlaw.com; SidleyParmalatCounsel@sidley.com; Ruskay-Kidd, Scott; stroockparmalatcounsel@stroock.com; Harkness, Timothy P.; thuyinh@kdefe.com; Todd.fishman@newyork.allenoverly.com

Subject: Parmalat - Termination of Fact Discovery

Dear Michael,

Please see the enclosed letter.

Regards,

Loren Kieve

Michael J. Dell

Partner
Kramer Levin Naftalis & Frankel LLP
1177 Avenue of the Americas
New York, New York 10036
Tel: 212-715-9129
Fax: 212-715-8000

6/4/2007

Email: mdell@KRAMERLEVIN.com
<http://www.kramerlevin.com>

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Sidley Austin LLP mail server made the following annotations on 04/06/07, 16:08

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